## Federal Defenders OF NEW YORK, INC.

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Honorable Paul A. Crotty United States District Judge Southern District of New York 500 Pearl Street, Room 1350 New York, New York 10007

<u>United States v. Michael Van Praagh</u> Re: 14 CR 189 (PAC)

Dear Judge Crotty:

Without objection from either probation or the Government, I write to request early termination of Mr. Van Praagh's term of supervised release. Mr. Van Praagh has served almost 3 years of his five-year term of supervision. Since his release from custody, Mr. Van Praagh has been employed full-time as a member of IATSE, the International Alliance of Theatrical Stage Employees. He has continued his postgraduate education and expects to obtain his bachelor's degree in labor studies this fall from SUNY Empire. Most importantly, he has completed drug treatment and remained sober and drug free. He has a stable residence with his father and younger brother, two blocks away from his niece and two nephews, and is in a committed long-term relationship. He has been in full compliance with all of the terms of his supervised release for the past three years.

18 U.S.C. §3583(e) gives the Court authority to terminate supervision at any time after the expiration of one year, if such action is "warranted by the conduct of the defendant released and the interests of justice." In this case, as set forth more fully below, early termination is warranted here by Mr. Praagh's conduct and the interests of justice.

## **Procedural History**

In 2015, after a jury trial, the Court sentenced Mr. Van Praagh to a term of 144 months in custody, followed by five years of supervised release, recommending